

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

UNITED STATES OF AMERICA,)	
)	
Plaintiff,)	
)	No. 08 CR 00009-2
v.)	Hon. Virginia M. Kendall,
)	presiding
LEON AMIEL, JR.)	
aka Leon Glass,)	
Defendant.)	

UNOPPOSED MOTION FOR PERMISSION TO TRAVEL FOR A LIMITED PURPOSE
AND TO WAIVE DRUG TESTING AS A CONDITION OF PRETRIAL RELEASE

Now comes the Defendant, LEON AMIEL, by and through his attorney, THOMAS A. GIBBONS, of KREITER AND GIBBONS & ASSOCIATES, pursuant to Fed. R. Crim. P. 12, and moves this Honorable Court to enter an order granting the defendant permission to travel for a limited purpose and waiving drug testing as a condition of pretrial release, and in support the defendant states as follows:

1. The defendant is charged with fraud in violation of 18 U.S.C. §§ 1341, 1343.
2. The defendant, who lives in New York, upon being informed of his indictment in this matter, voluntarily presented himself to this Court on March 27, 2008, for arraignment, at which time he was released on a \$4,500 personal recognizance bond.
3. Defendant has fully complied with all the conditions of his release.
4. One of the conditions of release checked off on the bond order required the defendant to submit to drug testing as directed by pretrial services in order to determine if the defendant was using a controlled substance.

5. Because the instant case is not drug related and there is no indication whatsoever that the Defendant is currently using illicit drugs, the Defendant wants to have the condition that he continue to submit to drug testing waived.

6. The defendant has taken several drug tests, all of which have been negative for the presence of illegal drugs.

7. Further, the defendant's 10 year old daughter is attending a summer camp for 4 weeks in Reeders, Pennsylvania, and the defendant would like to visit his daughter during the weekend of July 25 through July 27, 2008, which is the date the camp has scheduled for parent visits.

8. The undersigned has contacted Christa Brown, the defendant's pretrial services officer in Chicago, who verified that the defendant is in compliance with the conditions of bond.

9. Ms. Brown has indicated to the undersigned that she has no objection to waiving the drug testing requirement, and that she has no objection to the defendant's request to travel to Pennsylvania for the limited purpose as set forth above, as long as the defendant provides her with a detailed itinerary beforehand.

10. The government has indicated that they have no objection to the aforementioned requests as long as pretrial services is not opposed.

Wherefore, the defendant respectfully requests that this Honorable Court enter an order allowing the Defendant to travel to Reeders, Pennsylvania from July 25 through July 27, 2008 and waiving drug testing as a condition of pretrial release.

Respectfully submitted,

By: s/ Thomas A. Gibbons

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